

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CR. NO. 4:14-CR-00168
	§	
MARCOS CARRION	§	

**DEFENDANT MARCOS CARRION UNOPPOSED MOTION TO AMEND
CONDITIONS OF PRETRIAL RELEASE**

TO THE HONORABLE SIM LAKE, DISTRICT JUDGE FOR THE SOUTHERN
DISTRICT OF TEXAS:

The Defendant, Marcos Carrion, in the above-styled and numbered cause, by and through the undersigned counsel, respectfully moves this Court to amend conditions of pretrial release. In support of this motion, the Defendant would show the Court as follows:

1. Carrion is charged with conspiracy to possess with intent to distribute a controlled substance. The trial is presently scheduled for August 25, 2014 at 1:00 p.m.

2. Carrion is employed by Metro Glass located in Houston, Texas. Metro Glass is a commercial glazing contractor. His duties include estimating, project management, and installation. He is required to travel within the State of Texas to

perform the essential duties of his job. Additionally, Carrion is required work at varying hours of the day and evening. (*See Attached Letter from Metro Glass*).

3. Carrion is requesting to amend condition (i) in the Order Setting Conditions of Release, Document Number 8, to allow Carrion's travel to be within the State of Texas at the discretion pretrial services.

Respectfully submitted,

GRECO ♦ NEYLAND, PC

/s/ Dustan Neyland

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ATTORNEY FOR DEFENDANT,
MARCOS CARRION

CERTIFICATE OF CONFERENCE

On June 12, 2014, counsel for Defendant conferred with AUSA Mark Donnelly concerning his position on Defendant's Motion to Amend Conditions of Pretrial Release and was informed that he is unopposed.

/s/ Dustan Neyland

DUSTAN NEYLAND

CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2014, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to AUSA Mark Donnelly.

/s/ Dustan Neyland

DUSTAN NEYLAND